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8 Attorneys for Plaintiff
9 JAMES A. TURPIN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

2 JAMES A. TURPIN) Case No.: 2:16-cv-01695-RFB-PAL
3 Plaintiff,)
4 v.) STIPULATION TO EXTEND TIME
5 NANCY A. BERRYHILL, Acting) TO FILE MOTION FOR REVERSAL
Commissioner of Social Security.) AND/OR REMAND
6 Defendant.) (FIRST REQUEST)

9 Plaintiff James A. Turpin and Defendant Carolyn W. Colvin, Acting
10 Commissioner of Social Security, through their undersigned attorneys, stipulate,
11 subject to this court's approval, to extend the time to May 11, 2017 for Plaintiff to
12 file Plaintiff's Motion for Reversal and/or Remand; and that Defendant shall have
13 until June 12, 2017, to file her opposition, if any is forthcoming. Any reply by
14 plaintiff will be due July 3, 2017.

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1 As the Court is aware, after a 5 year battle with terminal stage 4 cancer
2 Plaintiff's Counsel's Spouse of the associate, who this matter is assigned to, passed
3 away on September 30, 2016. The aftermath of this traumatic event on both
4 Counsel and his 9 year old son and 7 year old daughter was immeasurable.
5 Compounding the impact of this loss is the fact that Counsel's spouse was a former
6 employee at Counsel's Law Firm and her death was far reaching in its impact on
7 Counsel's professional life as well. Due to the death, the subsequent holiday
8 period, and the need to find a permanent caregiver and the required time to
9 acclimate his children to that presence during his absence to meet his professional
10 obligations, Counsel requires the additional time to prepare and file her motion for
11 summary judgment.

12 Counsel for plaintiff does not anticipate this extraordinary request for more
13 time to become the rule and recognizes it is the extraordinary exception and
14 sincerely apologizes to the court for any inconvenience this may have had upon it
15 or its staff.

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1 DATE: March 8, 2017

Respectfully submitted,

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LAWRENCE D. ROHLFING

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/s/ Cyrus Safa

4 BY:

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Cyrus Safa
Attorney for plaintiff Mr. James A. Turpin

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7 DATE: March 8, 2017

Daniel G. Bogden
8 United States Attorney

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10 */s/ Jeffrey T. Chen*

11 BY:

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Jeffrey T. Chen
Special Assistant United States Attorney
13 Attorneys for defendant Nancy A. Berryhill
|*authorized by e-mail|

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15 DATED:

16 IT IS SO ORDERED:

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RICHARD F. BOULWARE, II
United States District Judge

DATED this 9th day of March, 2017.

**CERTIFICATE OF SERVICE
FOR CASE NUMBER 2:16-CV-01695-RFB-PAL**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on March 8, 2017.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ *Cyrus Safa*

Cyrus Safa
Attorneys for Plaintiff